

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK



(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Dianna Lysius A.C.

-against-

NYC Law Dept, NYC DOE
Meisha Porter, Julia Bore,
Kerni Moser, Frank DiFranco
(see attach)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial:

☒ Yes ☐ No
(check one)

(Speed Trial
if applicable)

CV 21-3962

GUJARATI, J.

BLOOM, M.J.

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address

Dianna Kysius
1080 Creston Road 13B
Brooklyn Kings
NY 11239
(718) 212-7747
kysiusd@yahoo

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(if known)

NYC Raw Dept
Attorneys for Defendant
100 Church Street
NY New York
NY 10007
Stgoe@ny.nyc.gov
H.Sarden@law.nyc.gov

Defendant No. 2

Name

Kerri Moses

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

●

E-mail Address
(if known)

Defendant No. 3

Name

Julia Borl

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 4

Name

Meisha Porter

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 5

Name

Frank DiFranco

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 6

Name

Rinda Sarokhian

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 7

Name

Rachelle Bogen

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 8

Name

Jacqueline Bellabone-Miglin

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 9

Name

Caitlin Jennifer

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

Defendant No. 10

Name

Jennifer Allan

Job or Title
(if known)

Street Address

100 Church Street

City and County

NY New York

State and Zip Code

NY 10007

Telephone Number

E-mail Address
(if known)

See attached

(11) Mr. Leigh

(12) Mrs. Diane Lees

The following are the additional
dependants in the matter. 6-12

- ⑥ Linda Sakorison
- ⑦ Rachelle Berger
- ⑧ Jacqueline Dellabonnie-Migliaro
- ⑨ Caitlin Viscio
- ⑩ Jennifer Itah
- ⑪ Mr. Leigh
- ⑫ Irene Rees

The above dependants address
to NYC New Dept 100 Church St.
NY NY 10007.
Attention
Sharon Flores
Hannah Saroken

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address

Dianna Mysius
1280 Croton Road BB
Blau NY 11239
646-210-7747
mysiusd@yahoo

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(if known)

NYC Law Dept Hannah Sarokin
attorney
100 Church
NY NY 10007
HSarokin@law.nyc.gov

Defendant No. 2

Name
Job or Title
(if known)
Street Address
~~City and County~~

Sharon Glover
attorney
100 Church Street NY NY 10007
Sglover@law.nyc.gov

Defendants in Caption

Ilene Lees

Linda Sakariassen

Rochelle Berger

Jennifer Ittah

Barbara Freeman

Viscio Carlin

Jacqueline Pellaborie-Miglino

Craig Edwards

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ State or local officials (a § 1983 claim)
☒ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

My child Civil Rights to a free
education has be violated and discriminated
under 42 USC

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See attached violations which
has deprived my son from receiving
a normal education without
being harassed, his life has
been threatened to be KILLED
and DOE wants me to accept
money to avoid prosecution.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

All the events took place at
1925 Stuart Street Bllyn NY
11229

- B. What date and approximate time did the events giving rise to your claim(s) occur?

Starting August 2019 to date. The
last attack was yesterday
July 12, 2021 "Racial Abuse"
He accuse my son of an attack.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

The assistant principal Frank
DiFrance threatened to hang my
11 year African American child
as a result of pending investigations
into the abuses that I violated
my son civil rights under
42 USC 1983. My son is
about to be in the same
building and removing my
child from the school results
in all pending investigations
to be dismissed.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

My sons coat was stolen in a month by Rachelle Berger and Frank DiFranco, he stole my sons change & the grades from 100 and 90 to 24 and 20. DOE observed him on camera and yet try to attack me and overlook the abuse. We are now being harassed aggressively. I have AUDIO.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Issue Order of Protection. Issue a stay from any civil right violations against my son, to include Ceist and Decist from separating the way enters school doors, no one needs to escort my kid, do not touch his belonging Mr. DiFranco, Mrs. Sakarasan, and Mrs. Rachelle Berger who have physically harm my kid to be removed until the trial or DOE investigation complete.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 13, 2011

Signature of Plaintiff [Signature]

Printed Name of Plaintiff Diana Lysius